Comments on 7/21/ Staff draft EWA Conclusions to date /Implementation Plan

Page 1:

General conclusions Bullet 1: what is meant by "funds that can be used to purchase other environmental benefits"?

Bullet 2: This is a chicken and egg situation. I would say the EWA (with appropriate sharing formulas, etc.) or, alternatively, some prescriptive operational requirements are a key feature (prerequisite?) of operating the south Delta improvements that are mentioned.

Bullet 3: We have no way to judge the usefulness of these screened, remote-but-connected diversion points and have not explicitly evaluated them. I would characterize having several diversion locations to chose from as potentially useful.

Bullet 4: This statement implies that money for water acquisitions would not be needed in later stages. I think the need would be long-term, perhaps indefinite.

Bullet 6, line 2: ...to provide both the Delta fishery protections.....and the water supply......

Bullet 7, second sentence: However, these differences have been clearly described. While some could be analyzed further within the next several months, most will require additional field experiments or long-term monitoring for resolution.

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B. 8: I would not use the word <u>severely</u>. Too many connotations. I also do know if I am ready to accept that the <u>most significant benefits</u> were to smelt and SJ salmon. Large percentage benefits for SJ salmon survival came from the base run in all but Game 5; EWA didn't add much to that. Even small increases in survival for the listed Sacramento stocks might be considered very significant.

Bullet 9: The EWA provided additional protective actions at times when the prescriptive standards did not. I think the second sentence has it backwards. Shouldn't it saysalvage reduction per acre-foot of export reductions was substantially higher under the EWA approach?

Bullet 10: Having EWA water in south of Delta storage was most useful. Borrowing from the projects involved having to make adjustments later with potential fishery impacts made borrowing, although perhaps equally useful, less desirable. Better to have move the water ahead of the need than to accrue a big debt with the pressure to pump to pay it back.. (This is captured in Issue #3 on the next page.)

Page 3, Issue 1: This seems like a mis-characterization of the relationship between the EWA and the water users dilemma. Isn't the inability to meet water users expectations largely independent of EWA?

Issue 4: last sentence -essentially competing with the projects for facilities capacity and available water.

Issue 6: What does it mean to DISRUPT the water transfer market? I'm not an economist (or a lawyer, and hopefully not the other category in BJ's joke) but isn't the idea of the market that supply and demand and other principles of economics will determine how much water is available for sale and at what price? Are we implying the need for market REGULATION?